

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
MELISSA MARIE CALDWELL, :
Debtor :
 :
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, :
Movant :
 :
vs. :
 :
MELISSA MARIE CALDWELL, :
Respondent : CASE NO. 1-24-bk-00927-HWV

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 16th day of June 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Trustee avers that Debtor's Plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
 - b. The Plan fails to provide that the sale or refinance of Debtor's real estate will occur within six (6) months.
 - c. The Plan is ambiguous as to the Term.
2. Debtor has not demonstrated that all tax returns have been filed as required by § 1325(a)(9), specifically, Debtor's 2022 federal taxes have not been filed.
3. The Plan has not been served as required by LR 3015-1(b) as to the creditors listed in Paragraphs 2.E. and 2.G. of the Plan. The Plan was not served at all.

WHEREFORE, Trustee alleges and avers that Debtor's Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtor's Plan;
- b. dismiss or convert Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 16th day of June 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

E. Haley Rohrbaugh, Esquire
CGA Law Firm, P.C.
135 North George Street
York, PA 17401

/s/ Derek M. Stroupbauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee